Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	))	WC Docket No. 11-42
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal Service	)))	CC Docket No. 96-45
	)	
Advancing Broadband Availability Through Digital Literacy Training	)))	WC Docket No. 12-23

Reply Comments of the Wisconsin Department of Public Instruction

Advancing Broadband Availability for Low-Income Americans Through Digital Literacy Training

The Department of Public Instruction (WIDPI) is the state's education and library agency. We appreciate the opportunity to comment on this important issue. In general, the department is in agreement with the initial comments filed by the American Library Association (ALA) and EdLinc. ALA in particular has well articulated the position that libraries occupy to help address the digital literacy divide. In addition, we make the following more specific observations or recommendations:
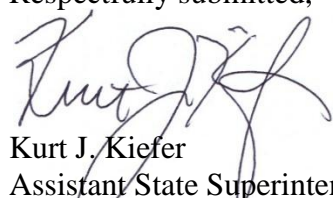
- *Digital literacy and E-rate:* ALA, EdLinc, and several other commenters expressed concerns about possibly adding a digital literacy component to the E-rate program. We very much agree that the E-rate is not the appropriate place for a digital literacy program. A total of 46,838 applications were received for the July 1, 2012, E-rate funding year. Even with added resources, the Schools and Libraries Division (SLD) does not need another program to implement and administer.

- *Eligibility:* The FNPRM recommends that libraries currently offering digital literacy programs be ineligible to apply. We disagree with this position. First, trying to define what constitutes a digital literacy "program" and then determining what libraries are offering such programs will likely be fraught with errors. Second, many libraries now offering digital literacy programs could likely increase their programming if they had more funding.

- *Match requirement:* At a time when library and school budgets are under severe fiscal pressures, we do not believe that requiring a local match will further the overall goal of increasing digital literacy. In addition, requiring a local match can be difficult to verify and is subject to abuse.

- *Funding allocation:* We do not think the suggested allocation of digital literacy funding— with 80 percent to libraries and 20 percent to schools—is necessary. While recognizing that libraries will likely take advantage of this program more than schools, we see no need for such a distinction. Our K-12 schools—especially those open during non-student hours (the School Spots initiative)—are in a good position to help address digital literacy needs in their communities.

- *Funding level:* The proposed $15,000 level of funding is too arbitrary and does not take into account the wide variation in community size and need. We suggest the Commission consider some type of funding formula based on a community's level of poverty. (Poverty data are readily available from the Census Bureau and school district free/reduced lunch data.)

- *Application process:* In developing the digital literacy program and application process we recommend the Commission work closely with the Institute of Museum and Library Services (IMLS), the National Telecommunications and Information Administration (NTIA), and the Chief Officers of State Library Agencies (COSLA). As ALA correctly states, all of these entities have "extensive experience in administering content programs to the library community." We *strongly endorse* this ALA recommendation.

- *Consortia applications:* The ALA also recommends that consortia applications at a regional or even state level be eligible to apply. We not only support this recommendation but encourage the Commission to give consortia applications some type of priority ranking. Consortia applications have many benefits over individual applications. For example:
    - Overall better coordination and collaboration of digital literacy efforts in a specific region or throughout a whole state.
    - More efficient use of funds by having less duplication of digital literacy resource and training materials, staff, etc.
    - Reduced burden of the application process, especially on smaller libraries. Why should scores of libraries file individual applications instead of one consolidated application? (In reality unless there is some type of consortia application option many smaller libraries will likely not apply.)
    - Many states—including Wisconsin—have regional library (and school) cooperatives which have considerable experience in writing applications, implementing programs, conducting training, etc. Any federal digital literacy program should take advantage of this regional structure that already exists.
    - Consortia applications will reduce the number of applications and thus likely make program administration at the federal level more efficient.

Thank you for listening to our concerns and recommendations. We look forward to helping address the digital divide via this new digital literacy program.

Respectfully submitted,

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